

**IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT
OF TENNESSEE AT GREENEVILLE, TENNESSEE**

**TINA NORRIS, MELISSA BLEVINS and
APRIL YARBER, surviving children and next
kin of TERESA NORRIS; and APRIL YARBER*
Administrator of the Estate of TERESA
NORRIS,**

Plaintiffs,

vs.

**MOUNTAIN STATES HEALTH ALLIANCE,
d/b/a THE TRANSPLANT CENTER at
JOHNSON CITY MEDICAL CENTER;
BLUE RIDGE MEDICAL MANAGEMENT
CORPORATION, d/b/a BLUE RIDGE
SURGICAL ASSOCIATES; JOSEPH LEE,
M.D.; and JON JONES, M.D.,**

Defendants.

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*** Case No. 2:12-cv-00415**

*** JURY DEMANDED**

FIRST AMENDED COMPLAINT

Come the Plaintiffs pursuant to Rule 15 of the Federal Rules of Civil Procedure and respectfully amend the Complaint filed in this cause on October 11, 2012 as follows:

1. Paragraphs 1-36 of the original Complaint are incorporated herein by reference.
2. Page 1 of the "HIPPA Compliant Authorization for Release of Medical Information" attached hereto as part of this First Amended Complaint is substituted for page 1 of the "HIPPA Compliant Authorization for Release of Medical Information" filed on October 11, 2012.
(Document 1-11 filed 10/11/12 Page 2 of 6 PageID#:64). Page 1 of the HIPPA form filed on

October 11, 2012 was filed in error. Page 1 of the HIPPA form attached as part of this First Amended Complaint was, in fact, the HIPPA Authorization that was mailed with the Notice Letters to the Defendants and other providers on June 13, 2012.

RESPECTFULLY SUBMITTED,

**TINA NORRIS, MELISSA BLEVINS and
APRIL YARBER, surviving children and next
kin of TERESA NORRIS; and APRIL YARBER
Administrator of the Estate of Teresa Norris**

BY:s/John S. Bingham, Esq., BPR6263

Attorney for Plaintiffs

**HAWKINS BINGHAM & MILLER, PC
1397 E. Center Street
Kingsport, TN 37664**

**423-246-9100 telephone
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HIPPA COMPLIANT
AUTHORIZATION FOR RELEASE OF MEDICAL INFORMATION

Patient:
TERESA NORRIS

Birth Date:
1/17/50

Social Security No.:
226-80-2348

A. I hereby authorize any of the following listed providers to release information from my medical records to any other medical provider listed below:

Joseph Lee, M.D.; Jon Jones, M.D.; Elvira Loria, M.D.; Mountain States Health Alliance, d/b/a The Transplant Center at JCMC; Mountain States Health Alliance, d/b/a Johnson City Medical Center; Mountain States Health Alliance, d/b/a Smyth County Community Hospital; Blue Ridge Medical Management Corporation, d/b/a Blue Ridge Surgical Associates; Drs. Green, P.C.; Medical Education Assistance Corporation, d/b/a ETSU Physicians & Associates

B. For the following purpose: To be reviewed by said providers and his/her/their attorneys, agents or representatives.

C. For treatment dates: 01/01/07 to 11/12/11

D. Description of Information to be used.

Copies of medical records regarding TERESA NORRIS in the possession of the medical providers listed above in Part A, including but not limited to, all medical records, meaning every page in the records, including but not limited to: office notes, face sheets, history and physical, consultation notes, impatient, outpatient and emergency room treatment, all clinical charts, reports, order sheets, progress notes, nurse's notes, social worker records, clinic records, treatment plans, admission records, discharge summaries, requests for and reports of consultations, documents, correspondence, test results, statements, questionnaires/histories, correspondence, photographs, telephone messages, and records received by other medical providers. All physical, occupational and rehab requests, consultations and progress notes. All autopsy, laboratory, histology, cytology, pathology, immunohistochemistry records and specimens; radiology records and films including CT scan, MRI, MRA, EMG, bone scan, myelogram; nerve conduction study, echocardiogram and cardiac catheterization results, videos/CDs/ films/ reels and reports. All pharmacy/prescription records. All billing records including all statements.